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ISLAND HOSPITALITY MANAGEMENT III,
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TERESA GARCIA, an individual, on
behalf of herself and others similarly
situated,

Plaintiff,

v.

ISLAND HOSPITALITY
MANAGEMENT III, LLC, a Delaware
corporation; and, DOES 1 through 50,
inclusive,

Defendants.

CLASS ACTION

Case No. 8:24-cv-00583-DOC-ADS

**PLAINTIFF TERESA GARCIA
AND DEFENDANT ISLAND
HOSPITALITY MANAGEMENT
III, LLC'S NOTICE OF JOINT
MOTION FOR FINAL APPROVAL
OF CLASS ACTION
SETTLEMENT**

Date: December 9, 2024
Time: 8:30 a.m.
Crtrm: 10A

Complaint Filed: September 6, 2023

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5 Attorneys for Plaintiff, Theresa Garcia, an individual
on behalf of herself and others similarly situated
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**TO THE UNITED STATES DISTRICT COURT FOR THE CENTRAL
DISTRICT OF CALIFORNIA:**

PLEASE TAKE NOTICE that on December 9, 2024, at 8:30 a.m., in Courtroom 10A of the United States District Court for the Central District of California, 411 West Fourth Street, Courtroom 10A, Santa Ana, California 92701, Plaintiff Teresa Garcia (“Plaintiff”) and Defendant Island Hospitality Management III, LLC (“Defendant”) (collectively, the “Parties”) will and hereby do move this Court for entry of an Order, pursuant to Fed. R. Civ. Proc. 23(e), for final approval of the previously-filed Joint Stipulation of Class Action Settlement and Release of Claims (“Settlement”), whereby this Court would:

(1) Finally approve the Settlement as fair, reasonable, and adequate under Fed. R. Civ. Proc. 23(e);

(2) Finally certify the Settlement Class, as defined in the Settlement, for purposes of settlement only;

(3) Appoint Jose Garay of Garay Law, APLC as Class Counsel;

(4) Appoint Plaintiff as the Class Representative;

(5) Appoint Phoenix Class Action Administrative Solutions as the Settlement Administrator; and

(6) Enter final judgment in the form of the [Proposed] Final Approval Order filed herewith.

This Motion For Final Approval Of Class Action Settlement is based on this Notice of Joint Motion and Motion, the supporting Memorandum of Points and Authorities, the accompanying Declarations of Jose Garay, Michael Afar, and Taylor Mitzner, the [Proposed] Order and Entry of Judgment, any argument of counsel, and all papers and records on file in this matter.

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2), the electronic filer below hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: November 8, 2024

GARAY LAW, APLC

By: /s/ Jose Garay
Jose Garay

Attorneys for Plaintiff, the Class
Representative, and Settlement Class

DATED: November 8, 2024

SEYFARTH SHAW LLP

By: /s/ Miguel A. Ramirez
Brian T. Ashe
Michael Afar
Bailey K. Bifoss
Miguel A. Ramirez

Attorneys for Defendant
ISLAND HOSPITALITY MANAGEMENT
III, LLC